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June 27, 2013

Via E-MAIL

Honorable Judge Jesse M. Furman
United States District Court
Southern District of New York
500 Pearl Street, Room 630
New York, New York 10007

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*Re: Pla, et al. v. Renaissance Equity Holdings, LLC, et al.,
12 Civ. 5268 (JMF)*

Dear Judge Furman:

The parties are writing this joint letter to seek the Court's permission to adjourn the deadline for defendants to respond to plaintiffs' motion for class certification pursuant to FRCP 23 sixty (60) days until August 26, 2013. Per Your Honor's May 31, 2013 letter endorsement, defendants are to submit opposition to such motion on or before June 28, 2013. However, the parties have mutually agreed to enter into settlement discussions in lieu of engaging in further motion practice.

The parties have engaged in settlement talks and have had preliminary discussions regarding the methodology as to resolve the claim of the opt-in plaintiffs and the putative members of the class who might join the action pursuant to the FLSA notice previously ordered in this matter. The parties seek to use such time to explore resolving all such claims or to agree to a methodology to resolve the claims of the putative plaintiffs. Additionally, the parties would like to use that time to discuss whether plaintiffs' attorneys fees can be resolved as to the Plaintiffs for whom judgment has been entered (Amado Pla, Yishmael Levi and Kevin Joseph) as well as attorneys' fees arising from the remaining plaintiffs and putative plaintiffs claims. Accordingly, pursuant to Your Honor's June 24, 2013 where the Court directed the parties to advise the Court whether attorneys' fees relating to the dismissed plaintiffs' claims should be addressed now or at the end of the litigation, the parties seek to hold off on such discussion in lieu of the sixty day period so as to see if the parties can resolve the attorneys' fees claims.

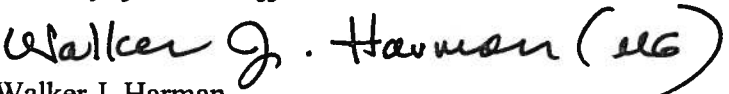
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If this application is not granted, in the alternative, defendants can submit their opposition to Plaintiffs Rule 23 Motion but would ask that the Court not rule upon such motion for sixty days to see if the parties can resolve this matter. We thank Your Honor in advance for such consideration.

Respectfully submitted,

THE HARMAN FIRM, P.C.

Attorneys for Plaintiffs


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Defendants are granted until July 29, 2013, to file their opposition to Plaintiffs' Rule 23 motion. Any reply is due one week thereafter.

SO ORDERED.



June 28, 2013